

FILED

B139

DEC - 3 2024

IN THE UNITED STATES DISTRICT COURT CLERK U.S. DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA WEST. DIST. OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

ISRAEL WASHINGTON

Criminal No. 2:24-cr-270  
(18 U.S.C. §§ 2252(a)(2) and (b)(1),  
2252(a)(4)(B) and (b)(2))

[UNDER SEAL]

INDICTMENT

COUNT ONE

The grand jury charges:

On or about March 31, 2022, in the Western District of Pennsylvania and elsewhere, the defendant, ISRAEL WASHINGTON, did knowingly distribute and attempt to distribute any visual depiction, namely videos in computer graphics and digital files, using any means and facility of interstate and foreign commerce, and that has been shipped and transported in and affecting interstate and foreign commerce, by any means including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, and the visual depiction is of such conduct.

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

**COUNT TWO**

The grand jury further charges:

On or about April 6, 2022, in the Western District of Pennsylvania and elsewhere, the defendant, ISRAEL WASHINGTON, did knowingly distribute and attempt to distribute any visual depiction, namely videos in computer graphics and digital files, using any means and facility of interstate and foreign commerce, and that has been shipped and transported in and affecting interstate and foreign commerce, by any means including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, and the visual depiction is of such conduct.

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

**COUNT THREE**

The grand jury further charges:

On or about March 7, 2024, in the Western District of Pennsylvania, the defendant, ISRAEL WASHINGTON, did knowingly possess any visual depiction, namely still images and a video in computer graphics and digital files, that has been mailed and shipped and transported using any means and facility of interstate and foreign commerce, and which was produced using materials which have been mailed and shipped and transported in interstate and foreign commerce, by any means, including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, and which depicted a prepubescent minor and a minor who had not attained 12 years of age engaging in such conduct, and the visual depiction is of such conduct.

In violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

**FORFEITURE ALLEGATIONS**

Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to the defendant, ISRAEL WASHINGTON, that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 2253, in the event of the defendant's conviction under Counts One through Three of this Indictment.

Pursuant to Title 18, United States Code, Section 2253, upon conviction of the offenses set forth in Counts One through Three of this Indictment, in violation of Title 18, United States Code, Section 2252, the defendant, ISRAEL WASHINGTON, shall forfeit to the United States of America any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense, and any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses.

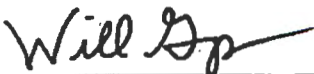
The property subject to this forfeiture notice includes, but is not limited to, a Motorola cell phone, model KE40.

A True Bill,

\_\_\_\_\_  
FOREPERSON



\_\_\_\_\_  
ERIC G. OLSCHAN  
United States Attorney  
IL ID No. 6290382



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WILLIAM B. GUAPPONE  
Assistant United States Attorney  
NC ID No. 46075